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BUYERQUEST, INC.

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12

13 TRADESHIFT, INC., a Delaware corporation,  
14 Plaintiff,  
15 v.  
16 BUYERQUEST, INC., an Ohio corporation,  
17 Defendant.

Case No. 3:20-cv-1294-RS

**STIPULATION AND ORDER TO  
MODIFY CASE SCHEDULE  
AS MODIFIED BY THE COURT**

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**STIPULATION TO MODIFY CASE SCHEDULE**

Tradeshift, Inc. (“Tradeshift”) and BuyerQuest, Inc. (“BuyerQuest”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, the Court issued an Initial Case Management Order on June 2, 2020 (ECF 36) identifying certain deadlines for fact discovery, expert reports, expert discovery, and dispositive motions;

WHEREAS, pursuant to the Stipulation of the parties, on January 21, 2021 (ECF 52), the Court entered an Order modifying certain discovery deadlines set by the Initial Case Management Order;

WHEREAS, the parties have engaged and continue to engage in good faith conferrals regarding discovery and preparation of the case for trial;

WHEREAS, the parties agree they will need additional time to complete depositions and, as a result, have stipulated to a proposed revised schedule for completing discovery,

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their respective counsel of record and subject to the approval of the Court, that the dates in the January 21, 2021 Stipulation and Order to Modify Discovery Deadlines shall be modified as follows:

Event	Current Deadline	New Deadline
Fact Discovery Cutoff for written discovery and production of documents.	March 22, 2021	April 2, 2021
Fact Discovery Cutoff for non-expert depositions.	March 22, 2021	April 30, 2021
Opening Expert Reports	April 26, 2021	May 14, 2021
Rebuttal Expert Reports	May 24, 2021	June 11, 2021
Expert Discovery Cutoff	June 21, 2021	July 9, 2021
Dispositive Motion Hearing	August 5, 2021	September 9, 2021
Pretrial Conference	October 20, 2021	No Change

Trial	November 1, 2021	No Change <sup>1</sup>
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Dated: February 19, 2021

By: /s/ Amy K. Van Zant  
AMY K. VAN ZANT  
Attorneys for Plaintiff  
TRADESHIFT, INC.

Dated: February 19, 2021

By: /s/ Anthony Phillips  
ANTHONY PHILLIPS  
Attorneys for Defendant  
BUYERQUEST, INC.

**ATTESTATION**

I attest that, under Civil Local Rule (5-1)(i)(3), I have obtained concurrence in the filing of this document from all Signatories.

/s/ Jason K. Yu  
Jason K. Yu

**IT IS SO ORDERED**

Dated: 2/19/2021



RICHARD SEEBORG  
Chief United States District  
Judge

<sup>1</sup>